

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

United State of America	)	
	)	
v.	)	Cr. No. 23-CR-12-1-PB
	)	
Rhonda Simpson,	)	
Defendant.	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

NOW COMES William E. Christie, counsel for Rhonda Simpson, respectfully moves for leave to withdraw as counsel for the Defendant. In support of this Motion, undersigned counsel states as follows:

1. The Defendant is charged by Indictment with Conspiracy to Submit False Claims contrary to 18 U.S.C. § 286 and Conspiracy to Make False Statements contrary to 18 U.S.C. §§ 371 and 1001(a)(1).
2. The Defendant entered into a Plea Agreement on the Conspiracy to Make False Statements count with a stipulated sentence of probation pursuant to Fed. R. Civ. P. 11(c)(1)(C).
3. On December 10, 2024, the Court rejected the stipulated sentence and imposed a sentence of 12 months home confinement.
4. On December 17, 2024, the Defendant withdrew her guilty plea and the matter was scheduled for trial.
5. The Final Pretrial Conference is presently scheduled in this matter for March 18, 2025. The 2-week Jury Trial is scheduled to begin on April 1, 2025.
6. On February 7, 2025, the Defendant informed undersigned counsel that she intends to retain new counsel to represent her interests going forward in this matter.

7. Accordingly, pursuant to LR 83.6(d), undersigned counsel seeks leave to withdraw as counsel for Rhonda Simpson. Undersigned counsel will notify the Clerk's Office, in writing, of Ms. Simpson's last known address.

8. Undersigned counsel has conferred with Charles Rombeau, Assistant U.S. Attorney, who advised the government takes no position on the relief sought herein.

9. Due to the nature of this Motion, no memorandum of law is necessary.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court:

- a. Grant the within Motion;
- b. Permit undersigned counsel withdraw as counsel for Rhonda Simpson;
- c. Grant such further relief as this Court deems necessary and just.

Respectfully submitted,

Rhonda Simpson  
By Her Attorneys:  
SHAHEEN & GORDON, P.A.

Dated: February 11, 2025

/s/ William E. Christie  
William E. Christie  
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### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

DATED: February 11, 2025

/s/ William E. Christie  
William E. Christie  
NH Bar #11255